

WILLIAM W. MANLOVE, OSB #891607
Senior Deputy City Attorney
william.manlove@portlandoregon.gov
Portland City Attorney's Office
1221 SW 4th Ave., Rm. 430
Portland, OR 97204
Telephone: (503) 823-4047
Facsimile: (503) 823-3089
Of Attorneys for Defendant City of Portland

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

HANNAH AHERN,

Case No.: 3:21-cv-00561-YY

PLAINTIFF,

DECLARATION OF KELSEY LLOYD

v.

**ERIK KAMMERER, CITY OF
PORTLAND; and JOHN DOES 1-5,**

(In Support of Defendant City of Portland's
Reply in support of Motion for Partial
Summary Judgment)

DEFENDANTS.

I, Kelsey Lloyd, declare as follows:

1. I am the Deputy Director of the City of Portland's Independent Police Review ("IPR") Division. I have held this position since July 2022. I was the Investigations Coordinator for IPR from January 2020 to July 2022. I started my employment with IPR and the City of Portland in April 2012.

2. On May 5, 2022, IPR opened a complaint based on a tort claim notice by Megan Opbroek about the conduct of an unidentified member of the Portland Police Bureau ("PPB"). IPR conducted a formal administrative investigation of Ms. Opbroek's complaint. The completed investigation was reviewed by PPB's Internal Affairs unit. The IPR investigation was reviewed by an Assistant Chief of Police, the Captain of PPB's Professional Standards Division

and me to determine whether the evidence proved misconduct. The allegation of misconduct related to whether an unidentified officer had improperly deployed a Rubber Ball Distraction Device ("RBDD"). The investigation found that the RBDD was likely deployed correctly, but had been inadvertently kicked or diverted after it was deployed. As a result, the Assistant Chief, the Captain of PPB's Professional Standards Division and I all agreed on a finding of exonerated on the misconduct allegation. A finding of exonerated means that the evidence demonstrated that the officer's conduct was within PPB policy.

3. Attached to this declaration as ***Exhibit 25*** is a true and correct copy of the Confidential Investigative Report, dated June 5, 2020, for IPR Case No. 2020-C-0044, for complainant Hannah Ahern. The investigative report is stamped AHERN_CITY_002385-2397. I understand that because ***Exhibit 25*** was provided confidentially to Ms. Ahern's attorneys, ***Exhibit 25*** will be submitted under seal with a declaration from Senior Deputy City Attorney William W. Manlove.

4. ***Exhibit 25*** to my declaration is kept in the course of IPR and the City's regularly conducted business or organizational activities.

5. I make this declaration in support of in support of Defendant City of Portland's Reply in support of Motion for Partial Summary Judgment.

I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

DATED: 3/20/24


KELSEY LLOYD